



D. Lee Roberts, Jr., Esq.  
Nevada Bar No. 8877

*lroberts@wwhgd.com*

Colby L. Balkenbush, Esq.

Nevada Bar No. 13066

*cbalkenbush@wwhgd.com*

Brittany M. Llewellyn, Esq.

Nevada Bar No. 13527

*bllewellyn@wwhgd.com*

WEINBERG, WHEELER, HUDGINS,

GUNN & DIAL, LLC

6385 South Rainbow Blvd., Suite 400

Las Vegas, Nevada 89118

Telephone: (702) 938-3838

Facsimile: (702) 938-3864

*Attorneys for Defendants UnitedHealthcare*

*Insurance Company, United HealthCare Services, Inc.,*

*UMR, Inc., Oxford Health Plans, Inc.,*

*Sierra Health and Life Insurance Co., Inc.,*

*Sierra Health-Care Options, Inc., and*

*Health Plan of Nevada, Inc.*

## UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
corporation,

Plaintiff,

vs.

UNITED HEALTHCARE INSURANCE  
COMPANY, a Connecticut corporation; UNITED  
HEALTH CARE SERVICES INC. dba  
UNITEDHEALTHCARE, a Minnesota  
corporation; UMR, INC. dba UNITED MEDICAL  
RESOURCES, a Delaware corporation; OXFORD  
HEALTH PLANS, INC., a Delaware corporation;  
SIERRA HEALTH AND LIFE INSURANCE  
COMPANY, INC., a Nevada corporation;  
SIERRA HEALTH-CARE OPTIONS, INC., a  
Nevada corporation; HEALTH PLAN OF  
NEVADA, INC., a Nevada corporation; DOES 1-  
10; ROE ENTITIES 11-20,

Defendants.

Case No.: 2:19-cv-00832-JAD-VCF

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
DEFENDANTS TO FILE THEIR  
OPPOSITION, AND FOR PLAINTIFF TO  
FILE ITS REPLY, TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE FIRST  
AMENDED COMPLAINT**

**(FIRST REQUEST)**



Pursuant to District of Nevada Local Rule 6-1(a), Defendants UnitedHealthcare Insurance Company (“UHIC”), United HealthCare Services, Inc. (“UHS”), UMR, Inc. (“UMR”), Oxford Health Plans, Inc. (“Oxford”), Sierra Health and Life Insurance Co., Inc. (“SHL”), Sierra Health-Care Options, Inc. (“SHO”), and Health Plan of Nevada, Inc. (“HPN”) (collectively “Defendants”), and Plaintiff Fremont Emergency Services (Mandavia), Ltd. (“Plaintiff”), by and through their respective counsel, stipulate and request that this Court extend the deadline to file Defendants’ Opposition to Plaintiff’s Motion for Leave to File First Amended Complaint (ECF No. 32) filed on October 30, 2019, by an additional 7 days from November 13, 2019 to November 20, 2019. The parties further stipulate and request that this Court extend the deadline to file Plaintiff’s Reply in support of its Motion for Leave to File First Amended Complaint to December 6, 2019. This is the first stipulation for an extension of time for the briefing related to Plaintiff’s Motion for Leave to File First Amended Complaint.

This request for an extension does not result from any improper purpose or to cause delay. Defendants requested an extension due to its position that the Motion for Leave contains complex issues at hand and because counsel has prior commitments in other cases, and adjustment to the reply deadline in light of the upcoming holiday.

///

///

///

///

///

///

///

///

///

///

///

///



WHEREFORE, the parties respectfully request that this Court extend the deadline to file Defendants' Opposition to Plaintiff's Motion for Leave to File First Amended Complaint (ECF. No. 32) to November 20, 2019. The parties further request that this Court extend the deadline to file Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Leave to File First Amended Complaint to December 6, 2019. This is the first stipulation for an extension of time for the briefing related to Plaintiff's Motion for Leave to File First Amended Complaint.

**IT IS SO STIPULATED.**

**WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC**

/s/ Colby Balkenbush

D. Lee Roberts, Jr., Esq.  
Colby L. Balkenbush, Esq.  
Brittany M. Llewellyn, Esq.  
6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118

*Attorneys for Defendants UnitedHealthcare Insurance Company, United HealthCare Services, Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc.*

**McDONALD CARANO LLP**

/s/ Kristen Gallagher

Pat Lundvall, Esq.  
Kristen T. Gallagher, Esq.  
Amanda M. Perach, Esq.  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

*Attorneys for Plaintiff Fremont Emergency Services (Mandavia), Ltd.*

IT IS SO ORDERED.

Cam Ferenbach  
United States Magistrate Judge

DATED: November 12, 2019